

REMARKS

Applicants are filing this Response within the shortened statutory period. Consequently, Applicants believe that no fee is due with this filing; however, if a fee is due please charge Deposit Account No. 502295.

Claims 1-20, 26 and 27 were presented for examination. The Office Action dated May 3, 2007 rejects claims 1-20, 26 and 27. Applicants herein amend claims 1, 2, 16, 17, 18, 26 and 27. Claims 1-20, 26 and 27 remain pending in the application.

Rejection of Claims 1, 2, 4-7, 9, 11-17, 19, 20 26 and 27 under 35 U.S.C. § 103(a)

The Office Action rejects claims 1, 2, 4-7, 9, 11-17, 19, 20, 26 and 27 under 35 U.S.C. §103(a) as being unpatentable over US Patent Publication No. 2003/0172113 to Cameron et al. (hereinafter “Cameron”) in view of US Patent Publication No. 2004/0230598 to Robertson et al. (hereinafter “Robertson”). Applicants respectfully traverse the rejection to the extent that it is maintained against the claims as amended herein because the cited references, either alone or in combination, do not teach or suggest each and every element of Applicants’ claimed invention.

Representative claim 1 as amended herein recites, in part, “initiating a synchronization task at the client, the synchronization task specifying a threshold value and identifying the server and the server database for synchronization.” Support for this amendment can be found at least at paragraph [00018] of Applicants’ specification.

The Office Action states that Cameron does not teach calculating a document score and does not teach transmitting one of the documents in the server database to the client based on a respective document score. The Office Action states that Robertson teaches these limitations missing from Cameron; however, Applicants submit that the limitation in claim 1 set forth above and introduced by the amendment made herein is not taught or suggested by either Cameron or Robertson. More specifically, Applicants submit that neither Cameron nor Robertson discloses or suggests initiating a synchronization task at the client where the

synchronization task specifies a threshold value and identifies the server and the server database for synchronization.

Cameron discloses a system and method for converting documents formatted for an office environment to and from documents formatted for small devices (e.g., personal digital assistants and cell phones), and for synchronizing these documents on small devices with office documents on a server. Documents on a client and the server can be merged if the two documents are independently modified. Document format differences are managed to achieve compatibility between documents edited and stored on the client and documents edited and stored on the server. (See, e.g., paragraphs 28 and 29.)

As stated in the Office Action, Cameron does not teach calculating a document score and does not teach transmitting one of the documents in the server database to the client based on a respective document score. Moreover, Applicants point out that Cameron does not teach a threshold for comparison with a document score. Thus Cameron does not teach or suggest the new limitation of a client that initiates a synchronization task that specifies a threshold value and identifies a server and a server database for the synchronization.

Robertson discloses a document filtering system. New documents, or modified documents, are compared to user profiles stored in memory. Terms in a new document along with their frequency of occurrence (i.e., weighting) are compared with terms and term weights in user profiles to determine whether the documents conform to or match any of the user profiles. If any matches are found, the new document, or a message identifying the new document, is then sent by the document filtering system to the users associated with the matching user profiles. (See, for example, paragraph [0020]). Each profile scoring file is associated with a single new document, or modified document, and is structured to maintain a profile scoring record for multiple user profiles (paragraph [0049]).

Although Robertson may employ user profiles and profile scoring files for user relevancy, these features are used only as part of a document filtering process for new or modified documents. The disclosed filtering process is not the same as a document synchronization process such as the synchronization recited in Applicants' claim 1. In contrast to Applicants' claimed invention, Robertson's server sends the new document (or a

message regarding the new document) to one or more users without any type of action or request from a user or client. Thus Robertson does not teach a client that initiates a synchronization task that specifies a threshold value and identifies the server and server database for synchronization. Furthermore, because the method disclosed in Robertson is adapted for document filtering for multiple users at one time (i.e., at the introduction of a new document), one of skill in the art would not be motivated to modify any combination of Robertson and Cameron to enable a client to initiate a synchronization task at a client.

As the two references discussed above do not teach or suggest each and every limitation in representative claim 1 as now set forth, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. 103(a) be withdrawn. Independent claims 16 and 26 recite similar language to claim 1 and therefore are patentable for at least those reasons provided with respect to claim 1. Claims 2, 4-7, 9, 11-15, 17, 19, 20 and 27 depend directly or indirectly from the patentable independent claims 1, 16 and 26, and incorporate all of the limitations of the respective independent claim. Therefore Applicants submit that these dependent claims are also patentably distinguishable over the cited references for at least those reasons provided in connection with claim 1, and Applicants request that the rejection of these dependent claims also be withdrawn.

Rejection of Claims 3 and 18 under 35 U.S.C. §103(a)

The Office Action rejects claims 3 and 18 under 35 U.S.C. §103(a) as being unpatentable over Cameron in view of Robertson and further in view of U.S. Patent No. 7,092,977 B2 issued to Leung et al. (hereinafter “Leung”). The Office Action states that Leung teaches that the threshold value is based on a data storage capacity of the client, as recited in claims 3 and 18. Leung discloses storage policies used to control the storing of data; however, like Cameron and Robertson, Leung does not teach or suggest “initiating a synchronization task at the client, the synchronization task specifying a threshold value and identifying the server and the server database for synchronization” as recited in Applicants’ amended independent claims. Claims 3 and 18 depend (through intervening claims 2 and 17) from independent claims 1 and 16, and incorporate all of the limitations of their base claims. Therefore Applicants submit that claims 3

and 18 are patentably distinguishable over any combination of Cameron, Robertson and Leung at least for the reasons provided above with respect to claim 1.

Rejection of Claims 8 and 10 under 35 U.S.C. §103(a)

The Office Action rejects claims 8 and 10 under 35 U.S.C. §103(a) as being unpatentable over Cameron in view of Robertson and further in view of U.S. Patent Publication No. 2005/0071741 to Acharya et al. (hereinafter “Acharya”). The Office Action states that Acharya teaches the limitation of assigning a document score having a maximum value to the newly created, or modified, document as recited in claims 8 and 10. Acharya generally discloses the scoring of documents based on historical data; however, like the references discussed above, Acharya does not teach or suggest “initiating a synchronization task at the client, the synchronization task specifying a threshold value and identifying the server and the server database for synchronization” as recited in Applicants’ amended independent claim 1. Claims 8 and 10 depend (through intervening claims 7 and 9, respectively) from independent claim 1, and incorporate all of the limitations of claim 1. Therefore Applicants submit that claims 8 and 10 are patentably distinguishable over any combination of Cameron, Robertson and Acharya at least for the reasons provided above with respect to claim 1.

CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims that have not been expressed.

In view of the remarks made herein, Applicants submit that the application is in condition for allowance and request early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicants' representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

Respectfully submitted,

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